

January 29, 2023

Lisa Crynock, Prothonotary
Cambria County Courthouse
200 S. Center Street.
Ebensburg, PA 15931

Prothonotary Cambria Co, PA, FILED
JAN 31 '23 PM02:51

CA

RE: Young
VS: Philip J Barbera

No : 2022-4614

Dear Ms. Lisa Crynock :

Enclosed for filing, please find an original and (1) copy
of our answer to Complaint in Civil Action relative to the above
captioned matter. I have provided a copy of the answer to the plaintiffs.

Sincerely



Philip J. Barbera

WILLIAM REYNOLDS YOUNG

JANURARY 30, 2023

CASSIDY REYNOLDS YOUNG

IN THE COURT OF

537 GREENFIELD AVE.APT # 3B

COMMON PLEAS OF

PITTSBURGH, PA 15207

CAMBRIA COUNTY

vs

PENNSYLVANIA

PHILIP BARBERA

CIVIL ACTION-LAW

135 BELMONT ST

JOHNSTOWN, PA 15904

Defendants, Case No. 2022-4614

Respectfully submitted

Philip Barbera

135 Belmont St. Johnstown, PA 15904

Phone # 814-322-5286

Defendant

VERIFICATION

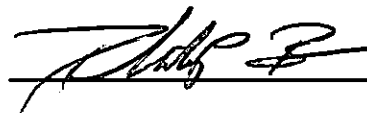
Understanding that the making of any false statement would subject me to the penalties of 18 Pa. C. S. Sec.4909 relating to unsworn falsification to authorities, I verify that the facts set out in the foregoing pleading are true and correct, to the best of my knowledge, information and belief.



Date: 1-31-23

Certificate of Service

I certify that I mailed a true and correct copy of this answer to the Youngs on 1-31 day of 23 2023 by U.S. Mail, first class postage paid.



Young
Plaintiff

vs.

Philip Barbera
135 Belmont St
Johnstown, PA 15904
Defendant

Answer:

To whom it may concern:

I Philip Barbera am filing a answer to a summons and complaint I have no case number 2022-4614

I would like to add that I Philip Barbera have been erroneously name in this complaint I do not own 1129 Otto Ct. Johnstown, PA 15905. As per request I am to answer each numbered paragraph agree or disagree.

Answer as follows for the court record.

1. Unknown : I don't know the plaintiffs relationship
2. Agree
3. Disagree : I do not own 1129 Otto Ct. Johnstown, PA 15905
4. Disagree : The property is a AirBNB type short term rental. It is not a leased premises. The plaintiffs were nightly guest.
5. Disagree : There was no lease agreement, the \$ 1800 deposit

was held for any damages to the property, appliances, furniture ect.

6. Disagree : The Guest entered a restricted area. The area was a construction area where new sewer and gas lines were being installed.

7. Disagree : The Guest changed locks on the property and entry was refused by the guest.

8. Disagree : Refer to # 7

9. Disagree / Agree, Agree the Guest left the keys on the table and checked out. Disagree, the property was damaged the unit had strong odors of cats, insect infestation, damaged furniture, damaged appliances and personal effects such as a cat climbing poles, pet food dishes and cat litter boxes were left in the unit.

10. Disagree : There was not a security deposit, a damage deposit was retained that did not cover all the damages.

11. Disagree : There was not a lease, the plaintiffs were guest and free to leave the nightly rental at any time.

12. Disagree : There was no need to respond to the guest complaint letter.

13. Disagree/Agree , Agree a civil action was filed. Disagree (b) The plaintiffs were not evicted, they locked out the owners of the property when contacted Mr Young told managers and maintenance workers to climb through a basement window if they wanted in.

14. Agree

15. Agree

16. Agree : Notice was sent certified mail December 20, 2022. Unknown, the plaintiffs were about 12-22-22 thru 12-30-22.

17. Disagree : I do not own the property. Also Landlord Tenant law does not apply to nightly stay real estate.

18. Disagree : The plaintiffs are trying to obtain a financial gain through a law that does not apply to their stay at the property.

The Youngs are disgruntled guest who through their negligence broke the stove and entered a restricted area after being told not to go into that area.

Philip Barbera

A handwritten signature in black ink, appearing to read 'Philip B', with a stylized flourish at the end.